

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Case No.: 6:15-bk-06248-ABB
Chapter 13

Ingrid Avilez,

Debtor.

**OBJECTION TO CONFIRMATION OF
CHAPTER 13 PLAN**

COMES NOW the secured creditor, Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-4 (“Secured Creditor”), by and through Counsel, Leslie Rushing, Esq. of Quintairos, Prieto, Wood & Boyer P.A., and hereby objects to confirmation of the Chapter 13 Plan (ECF No. 13). In support of its Objection, Creditor states as follows:

1. Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-4 is the holder of the Note and Mortgage for the real property located at 174 Dakota Avenue, Groveland, FL 34736.

2. On August 4, 2015, Debtor Ingrid Avilez, filed a Chapter 13 Plan with this Court. The Plan proposes a post-petition payment in the amount of \$775.03 paid to the Trustee and lists arrears in the amount of \$0.00.

3. There are pre-petition arrears owed in the amount of \$978.24. The Proof of Claim will be filed before the Bar Date of November 18, 2015.

Wherefore, Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-4, respectfully requests

confirmation of the Debtors Chapter 13 Plan be denied as the Debtor does not propose to pay the correct total amount of arrears due.

Respectfully submitted,

Dated: August 25, 2015

/s/ Leslie Rushing
Leslie Rushing, Esq.
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CERTIFICATE OF SERVICE

I certify that I have caused to be served a copy of the foregoing Objection to Confirmation of Debtors Plan, by first class mail, postage prepaid or by CM/ECF electronic filing upon the parties listed below on this day.

Dated: August 25, 2015

/s/ Leslie Rushing
Leslie Rushing, Esq.
Florida Bar No. 98106

Copies Furnished To:

By CM/ECF Receipt:

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By First Class Mail:

Ingrid Avilez
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